Travis Dutton

Please see the attached letter containing comments and recommendations from the Washington State Association of Counties and the Washington Association of County Solid Waste Managers. These comments and recommendations are in reference to the Preliminary Needs Assessment published on October 1, 2026.

WSAC WASHINGTON STATE ASSOCIATION of COUNTIES



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Solid Waste Management Program
P.O. Box 47600, Olympia, WA 98504-7600

Submitted through the Recycling Reform Act – Preliminary Needs Assessment comment portal

RE: Washington State Association of Counties Comments — Draft Washington Preliminary Needs Assessment (Publication 26-07-077, October 1, 2026)

The Washington State Association of Counties (WSAC) submits these comments for Washington's 39 counties and the Washington Association of County Solid Waste Managers (WACSWM). We thank Ecology and its consultants for building a statewide picture from data that is often limited and uneven.

Counties write the solid waste plans that set service levels for unincorporated areas. They also run many of the transfer stations and drop-off sites in the report, which are often the only recycling option for rural residents. This report will be the starting point for performance targets, payments to service providers, and future investments. Counties want it to be accurate, and we are committed to helping Ecology complete it.

Summary

1. **Complete the items the law requires,** using Ecology's authority to request data.
2. **Get the baseline right,** especially how self-hauled waste is counted.
3. **Count the full cost of county services,** including drop-off and transfer.
4. **Measure access where residents actually recycle,** and report results by county.
5. **Work with counties** to fill the data gaps. WSAC and WACSWM will help coordinate.

Completing the law's requirements

We recognize the barriers the consultants faced. Many service providers and facilities did not respond to surveys, some haulers treated cost data as confidential, and the timeline was short. Even so, the law lists 11 items this report must include (RCW 70A.208.110(3)), and several are not yet addressed:

- A total yearly estimate of collection and processing costs ((3)(i)).
- Densely populated areas that lack curbside recycling ((3)(c)(iii)).
- Covered materials sold into Washington by producers, by volume, weight, and type ((3)(k)).
- Services and costs in each county and city ((3)(c)), which the draft reports only as four regional averages.

Other items, such as sorting and compost facility details and market capacity, are only partly complete. The final report should complete each item. Where it cannot, it should say so and explain how the 2027 full needs assessment will.

The law gives Ecology a path forward. RCW 70A.208.110(7)(a) requires anyone with needed data to provide it on request, and (7)(b) protects confidential information. Using this authority, especially for cost data, would close the largest gaps. Counties will do our part, as described at the end of this letter.

The draft recommends that Ecology consider standard reporting requirements that protect sensitive information. We support that recommendation. We also ask Ecology to share a schedule showing which items will be completed in the final report by December 31 and which will move to the 2027 full needs assessment.



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Get the baseline right

By law, this report will be the baseline for judging progress toward program targets (RCW 70A.208.110(6)). Two issues need attention.

Self-hauled waste. The draft's totals only add up if almost all 1.84 million tons of self-hauled waste came from homes. Yet the draft says it cannot tell whether self-hauled garbage came from homes or businesses. Self-haul arrives at transfer stations and drop-off sites, many run by counties, and much of it comes from contractors and businesses. For example, the draft counts 28,892 tons of wooden pallets and crates as residential. We ask that the final report explain how self-haul was assigned and show the residential share as a range until better data is available.

Covered materials still thrown away. About 824,000 tons of covered materials collected at the curb from homes went to the garbage in 2024, or 46 percent. The largest amounts were paper products, plastic film, cardboard, and glass. The final report should group these tons by whether each material is on Ecology's statewide recycling list, composting list, or neither, as the law requires (RCW 70A.208.110(2)(d)(ii)). That shows how much more could be recovered.

Count the full cost of county services

The draft's $432-per-ton estimate came mostly from hauler data, so the costs of county-run drop-off sites and transfer stations are largely missing. In rural counties, these are often the main recycling costs. The figure also blends collection, transfer, hauling, sorting, contamination, education, and administration into one number. It does not say whether income from selling materials was subtracted.

Payments to service providers will be based on these costs. We ask that the final report break costs out by type of service and name which public facility costs are missing. The 2027 full needs assessment should then build the full cost of county services using shared definitions, as the basis for the payment method in RCW 70A.208.110(4)(k).

Many county programs, such as household hazardous waste collection and education, are funded by fees on garbage disposal. The full needs assessment should also describe how moving covered materials out of the garbage affects that funding.

Measure access where residents actually recycle

The draft measures whether curbside service is offered. Many rural and unincorporated residents recycle at drop-off sites instead, and county programs vary widely. We ask the final report to:

- **Measure drop-off access.** Report, by county, the share of homes within a set drive time of a drop-off site that takes the main materials on the statewide list. In county experience, accepted materials and hours vary from site to site.
- **Add garbage availability data.** The draft's “garbage but no recycling” figures for the Central and Eastern regions match its figures for homes without recycling. This suggests it assumed every such home has curbside garbage. In many rural areas, curbside garbage is optional and residents haul their own.
- **Show the unknowns.** Service availability is unknown for 19 percent of multifamily homes statewide, and about 40 percent in the Central and Eastern regions. These figures should appear next to the availability rates.
- **Report results by county.** The law asks for an evaluation in each county and city (RCW 70A.208.110(3)(c)). Service areas, drop-off locations, and public contracts are not confidential. County-level results would let counties check the findings and use them in plan updates.



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For public places, the full needs assessment should use the law's definition: places where a government managed recycling bins as of August 1, 2025. Counties manage many such places, including parks, fairgrounds, and trailheads, and can help build that list.

County facilities and material counties sell directly

The draft's description of limits at transfer stations matches county experience. Half of the stations that answered (16 of 32) said they cannot take more recyclables, citing space, storage, staff, trailers, and drivers. These are operating costs and investment needs, not just data gaps. The full needs assessment should put a price on them, as the law requires (RCW 70A.208.110(4)(j)).

The law defines a drop-off site as one open at least 12 hours a week all year. Some rural county sites have shorter or seasonal hours. The final report should say whether its site count used this standard, since it affects which county sites count as covered services.

Many rural counties sell sorted materials straight to buyers rather than through sorting facilities. These counties carry the risk when prices drop. The full needs assessment should track how much material moves this way and where it goes.

The draft also says Central and Eastern Washington typically use glass-only collection instead of curbside recycling. In county experience, a common approach is curbside service without glass, paired with glass drop-off. Programs vary, and the final report should describe them accurately.

Working together to complete the data

Few public facilities answered the surveys. For example, only 15 of 77 stand-alone drop-off sites responded. WSAC and WACSWM offer to coordinate county data for the final report and the 2027 full needs assessment, including:

- A list of county transfer stations and drop-off sites, with hours, accepted materials, and yearly tons.
- Cost information for county recycling services, using a shared form.
- Service levels and maps from county solid waste plans.
- Sampling of self-hauled waste at county sites.
- Follow-up with counties that did not respond, and review of county results before the report is final.

The draft recommends site visits to sorting facilities to learn about their operations and costs. County transfer stations and drop-off sites had the lowest survey response rates and should get the same follow-up. Counties are glad to host these visits.

To make this work, we ask Ecology to provide one data form with shared definitions, tell us which counties have responded, and use reports counties already file before requesting new data.



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Thank you for considering these comments. Counties share Ecology's goal of an accurate starting point for this program, and we look forward to helping complete it. Please contact me to begin coordinating county data.

Sincerely,

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cc: Washington Association of County Solid Waste Managers